UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF TEXAS, DEL RIO DIVISION

United States of America	§
	§ CRIMINAL COMPLAINT
VS.	§ CASE NUMBER: DR:22-M -01984(1,2,3)
	§
(1) Joseph William Herrera	§
(2) Brianna Yvonne Gonzales	§
(3) Tina Lynn Boudreaux	§

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about <u>August 17, 2022</u> in <u>Val Verde</u> county, in the <u>WESTERN</u> <u>DISTRICT OF TEXAS</u> defendant(s) did, conspire with and other unnamed co-conspirators, to transport, or move or attempt to transport or move, certain persons, knowing or in reckless disregard of the fact that that such persons were aliens illegally present in the United States, a felony,

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(v)(I)

I further state that I am a(n) **Border Patrol Agent** and that this complaint is based on the following facts: "On August 17, 2022, Joseph Herrera, Tina Boudreaux and Brianna Gonzales, all U.S. citizens, were arrested near Del Rio, TX for conspiracy to transport illegal aliens. BOUDREAUX was driving a silver 2007 Honda Ridgeline during a vehicle stop by DPS on FM 2523. HERRERA (driver) and GONZALES (passenger) were in a black 2012 Dodge Charger at the Checkpoint on FM 2523. Agents and troopers found four illegal aliens in

Continued on the attached sheet and made a part of hereof.

UNITED STATES MAGISTRATE JUDGE

Sworn to before me and subscribed in my presence,	/s/ Pena, Luis A Signature of Complainant Pena, Luis A Border Patrol Agent
08/23/2022 File Date	at DEL RIO, Texas City and State
VICTOR ROBERTO GARCIA	I Racere

WESTERN DISTRICT OF TEXAS

UNITED STATES OF AMERICA

vs. Case Number: DR:22-M -01984(1,2,3)

- (1) Joseph William Herrera
- (2) Brianna Yvonne Gonzales
 - (3) Tina Lynn Boudreaux

Continuation of Statement of Facts:

the Honda Ridgeline. BOUDREAUX admitted picking up four illegal aliens, was going back to Fort Worth and had smuggling related evidence on her phone. HERRERA admitted planning the smuggling venture with his uncle (Kelvin Baker) for \$1,000 USD per person. GONZALES kept lying to agents stating the Ridgeline was not hers, but was the registered owner, and this was her first time in Del Rio, but had a prior encounter with Del Rio USBP."

Signature of Judicial Officer

/s/ Pena, Luis A

Signature of Complainant